Case 1-17-01085-ess Doc 299 Filed 08/11/21 Entered 08/11/21 10:54:49

McGuireWoods LLP
JPMorgan Chase Tower
600 Travis Street
Suite 7500
Houston, TX 77002-2906
Phone: 713.571.9191
Fax: 713.571.9652
www.mcguirewoods.com

Thomas M. Farrell
Direct: 713.353.6677

MCGUIREWOODS

tfarrell@mcguirewoods.com Fax: 832.214.9933

August 11, 2021

## **VIA ELECTRONIC FILING**

Hon. Elizabeth S. Stong U.S. Bankruptcy Court Eastern District of New York Conrad B. Duberstein Courthouse 271-C Cadman Plaza East Courtroom 3585 Brooklyn, NY 11201-1800

Re: Homaidan v. Sallie Mae, Inc., 17-1085 (ESS)

Dear Judge Stong:

We write in reference to the above-captioned case. At the hearing in this matter on July 28, the Court directed the parties to submit a letter by August 11 as to whether they would request the Court refer the case to mediation.

Navient is considering the matter and would like to request that the deadline to submit such letter be extended one week until August 18 to accommodate scheduling conflicts with certain key personnel at Navient.

We have conferred with counsel to Plaintiff, who have said they do not oppose this extension request.

Thank you for Your Honor's consideration.

Dated: August 11, 2021 New York, New York Respectfully submitted,

## /s/ Shawn R. Fox

Shawn R. Fox McGuireWoods LLP 1251 Avenue of the Americas, 20th Floor New York, New York 10020-1104 Telephone: 212.548.2100 Email: sfox@mcguirewoods.com

-and-

## /s/ Thomas M. Farrell

Thomas M. Farrell (*pro hac vice*)
McGuireWoods LLP
JPMorgan Chase Tower
600 Travis Street, Suite 7500
Houston, Texas 77002
Telephone: 713.571.9191
E-mail: tfarrell@mcguirewoods.com

-and-

Dion W. Hayes (pro hac vice)
K. Elizabeth Sieg (pro hac vice)
McGuireWoods LLP
Gateway Plaza
800 East Canal Street
Richmond, Virginia 23219
Telephone: 804.775.1000
Email: dhayes@mcguirewoods.com
bsieg@mcguirewoods.com

Counsel for Defendants

Case 1-17-01085-ess Doc 299 Filed 08/11/21 Entered 08/11/21 10:54:49

## **CERTIFICATE OF SERVICE**

I certify that on this 11th day of August, 2021, I filed the foregoing document with the Clerk of Court using the CM/ECF system, which will send a notification of such filing to all counsel of record, including counsel for Plaintiff (ashaw@bsfllp.com).

/s/ Shawn R. Fox